



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

GEORGIA M. PESTANA
Corporation Counsel

WILLIAM T. GOSLING
Assistant Corporation Counsel
Phone: (212) 356-2384
wgosling@law.nyc.gov

December 1, 2021

VIA ECF

District Judge Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Garfield Anthony Williams v. City of New York, et al.,
20-cv-05995 (LGS)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, and the newly assigned attorney representing Defendant City of New York, Police Officer Oscar Hernandez, and Police Officer Joseph Ottaviano in the above-referenced matter (hereinafter “defendants”). Defendants write to respectfully request a 14-day extension, from December 1, 2021 to December 15, 2021, to file the status letter due to the Court by today, December 1, 2021. This is the first request for an extension of time to provide the Court with a Status letter regarding discovery. Plaintiff counsel consents to this request.

By Order dated November 15, 2021, Your Honor granted in part defendants’ application to extend discovery in this case to January 15, 2022. ECF No. 64. That Order also requires the parties to file a joint status letter by December 1, 2021 with dates certain for anticipated depositions. Id. On November 30, 2021, the undersigned filed a Notice of Appearance for this case as the new attorney recently assigned to handle the matter. ECF No. 65.

At this time, defendants seek an extension of the status report due today. The amount of time sought is necessary to allow newly-assigned defense counsel to become adequately familiarized with the allegations of the complaint and with the discovery exchanged to date. Prior to scheduling depositions the undersigned needs to familiarize himself with all of the discovery exchanged in this case.

For the reasons set forth above, defendants respectfully request that the Court grant a fourteen-day extension, from December 1, 2021 to December 15, 2021, of the status report regarding discovery currently due to the Court today.

Defendants thank the Court for its consideration of this application.

Respectfully submitted,

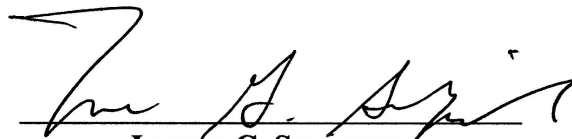
/s/ William J. Gasling
Assistant Corporation Counsel
Special Federal Litigation Division

BY ECF

Masai I Lord, Esq.
Lord & Schewel PLLC
Attorney for Plaintiff

Application **GRANTED in part**. The request is untimely and should have been made at least two business days in advance of the deadline sought to be extended. By **December 7, 2021**, the parties shall file a joint letter with dates certain for the depositions of Plaintiff and the Individual Defendants. According to this Court's November 15, 2021, Order, "[t]he parties shall complete fact discovery, including all document requests and outstanding depositions, by **January 15, 2022**. No further extensions will be granted absent extraordinary circumstances." (Dkt. No. 64.) The Clerk of Court is respectfully directed to close the motion at Dkt. No. 67.

Dated: December 2, 2021
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE